

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MOHAMMAD TABATABAEI,	)	
	)	
Plaintiff,	)	No. 08 C 1356
	)	
v.	)	
	)	
MICHAEL CHERTOFF, et al.	)	Judge Gettleman
	)	
Defendants.	)	

**UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE**

Defendants, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, move for a 60-day extension of time to respond to plaintiff's motion for judgment on the pleadings stating:

1. Plaintiff seeks a mandamus order requiring the defendants to adjudicate his naturalization petition.

2. On August 27, 2008, Plaintiff filed a motion for judgment on the pleadings. The court set a briefing schedule on plaintiff's motion such that defendant response brief is due on October 6, 2008.

3. After plaintiff filed his motion, the undersigned learned that the plaintiff's FBI name check has been completed and that the plaintiff has been scheduled for a naturalization interview on October 8, 2008.

4. Once the interview is completed, the defendants should be able to adjudicate the petition within 60 days which would make the plaintiff's motion moot.

5. Accordingly, defendants request that the court extend the briefing schedule for 60 days and order defendants response brief to be filed on or before December 5, 2008, and plaintiff's reply

to be filed on or before December 22, 2008. In the event the petition is adjudicated during briefing on the plaintiff's motion, the parties will notify the court.

6. Plaintiff's counsel was consulted regarding this motion and he has no objection.

WHEREFORE, defendants request that the court extend briefing schedule on plaintiff's motion for judgment on the pleadings for 60 days.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

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